

MICHAEL A. JACOBS (CA SBN 111664)
MJacobs@mofo.com
ARTURO J. GONZÁLEZ (CA SBN 121490)
AGonzalez@mofo.com
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, California 94105-2482
Tel: 415.268.7000 / Fax: 415.268.7522

KAREN L. DUNN (*Pro Hac Vice*)
kdunn@bsfllp.com
HAMISH P. M. HUME
hhume@bsfllp.com
BOIES SCHILLER FLEXNER LLP
1401 New York Avenue, N.W.
Washington, D.C. 20005
Tel: 202.237.2727 / Fax: 202.237.6131

WILLIAM CARMODY (*Pro Hac Vice*)
bcarmody@susmangodfrey.com
SUSMAN GODFREY LLP
1301 Avenue of the Americas, 32nd Floor
New York, NY 10019-6023
Tel.: 212.336.8330 / Fax.: 212.336.8340

Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MARTHA GOODMAN
IN SUPPORT OF PLAINTIFF'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL ITS MOTION IN LIMINE
NO. 15 (DKT. 1542)**

Judge: Hon. William H. Alsup
Trial Date: October 10, 2017

1 I, Martha L. Goodman, declare as follows:

2 1. I am an associate at the law firm Boies Schiller Flexner LLP representing Defendants
3 Uber Technologies Inc. and Ottomotto LLC (collectively, “Uber”) in this matter. I am a member in
4 good standing of the Bar of the District of Columbia. I make this declaration in support of Plaintiff’s
5 Administrative Motion to File Under Seal Its Motion in Limine No. 15 (Dkt. 1542). I make this
6 declaration based on personal knowledge and if called as a witness, I could and would competently
7 testify to the matters set forth herein.

8 2. I have reviewed the following documents and confirm that only the portions identified
9 below merit sealing:

Document	Portions to Be Filed Under Seal
Exhibit 39 to the Goodman Declaration ISO Defendants’ Opposition to Waymo’s Motion in <i>Limine</i> No. 15	Blue-highlighted

13 3. Waymo designated the entirety of Exhibit 39 as “Highly Confidential – Attorney’s Eyes
14 Only,” in accordance with the Patent Local Rule 2-2 Interim Model Protective Order (“Protective
15 Order”), which the parties have agreed governs this case. *See* 3/16 H’rg Tr. at 6. (Dkt. 1542.)

16 4. Exhibit 39 also contains the personal email address of a former Uber employee, the
17 disclosure of which would threaten the privacy of individuals at a company that is currently the subject of
18 extensive media coverage.

19 5. Defendants’ request to seal is narrowly tailored to those portions of Exhibit 39 that merit
20 sealing.

21 6. Pursuant to Civil Local Rule 79-5(d)(2), Uber will lodge with the Clerk the highlighted
22 versions documents at issue, with accompanying chamber copies..

23 I declare under penalty of perjury under the laws of the United States that the foregoing is true
24 and correct. Executed this 18th day of September, 2017, in Washington, DC.

25
26
27 /s/ Martha L. Goodman

28 Martha L. Goodman

ATTESTATION OF E-FILED SIGNATURE

I, Karen L. Dunn, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Martha L. Goodman has concurred in this filing.

/s/ Karen L. Dunn

Karen L. Dunn